

EXHIBIT B

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

**MICHAEL B. JOHNSON,
on behalf of himself and on behalf of those
similarly situated plaintiffs,**

Plaintiffs,

vs.

**PUSHPIN HOLDINGS, LLC, JAY
COHEN, LEONARD MEZEI, ARI R.
MADOFF, ALISHA ROSS, LOUISA
TATBAK, SHAUN REDWOOD, GCN
HOLDING, LLC, and CIT FINANCIAL
USA, INC.,**

Defendants.

Case No.

DECLARATION OF JOSEPH SUSSMAN

I, JOSEPH SUSSMAN, declare the following to be true:

1. I am over 18 years of age. I am an attorney with the law firm of Joseph I. Sussman, PC. My firm provides legal services to defendant Pushpin Holdings, LLC ("Pushpin").
2. I have reviewed the Complaint filed by plaintiff Michael B. Johnson, on behalf of himself and a putative class ("Plaintiffs").
3. I understand that Plaintiffs allege that Pushpin is filing and threatening to file lawsuits against members of the putative class without being registered with the Illinois Secretary of State as a foreign company, without being licensed and registered as a debt collection agency under the Illinois Collection Agency Act, and on time-barred debts and seek,

among other things, (i) disgorgement of all sums already obtained by Pushpin from its collection efforts against putative class members, (ii) forcing Pushpin to stop collection efforts from additional putative class members, (iii) attorney's fees, (iv) lost wages, and (v) punitive damages.

4. As part of its regular practice, Pushpin maintains records made contemporaneously in the regular course of business related to and concerning the underlying lease contracts at issue and the payments made and received thereunder.

5. I have reviewed such records and have concluded and determined that there are approximately 1,300 personal guaranties on lease contracts on which Pushpin has already commenced litigations in Illinois State Court.

6. The aggregate amount sought in these 1,300 cases already filed is approximately \$3,300,000 exclusive of interest and costs.

7. Additionally, there are several thousand additional guaranties on lease contracts on which Pushpin is ready and about to commence litigations in Illinois State Court.

8. The aggregate amount eligible to be sought in these several thousand additional guaranties on lease contracts is in excess of \$5,000,000 exclusive of interest and costs.

9. In sum, Plaintiffs' claims for money damages involve an amount in excess of \$5,000,000 exclusive of interest and costs.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 16, 2013.



JOSEPH SUSSMAN